

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Case No. 22-cr-10290-WGY
JASON DUHAIME,	)	
	)	
Defendant.	)	

**STIPULATION OF FACT**  
**Northeastern University**

The government and counsel for the Defendant have agreed to the following stipulation, which is herein proposed to the Court in a form suitable for presentation to the jury.

In lieu of live testimony, the United States and the Defendant, Jason Duhaime, have stipulated and agreed to the following facts:

- a. The Defendant, Jason Duhaime, was a salaried employee of Northeastern University.
- b. Through his employment, Mr. Duhaime received an American Express credit card to make job-related purchases. For each purchase made using his Northeastern University-issued American Express card, university policy required Mr. Duhaime to accurately record the type of item purchased and, when possible, provide a receipt reflecting the purchase. If the receipt was either lost or not obtained from the vendor, university policy also permitted Mr. Duhaime to submit a “missing receipt affidavit” that described the item and the purchase amount, and affirmed that the item served a legitimate business purpose. Mr. Duhaime had utilized this procedure in lieu of providing an actual receipt several times prior to September 2022.
- c. Northeastern University maintains records of all transactions associated with the use of Northeastern University-issued American Express credit cards.

- d. Using his Northeastern University-issued American Express card, Mr. Duhaime made purchases from the Northeastern University bookstore on a total of seven occasions between 2015 and September 2022:
- i. April 15, 2015;
  - ii. April 9, 2019;
  - iii. June 7, 2019;
  - iv. September 22, 2021;
  - v. September 23, 2021;
  - vi. July 14, 2022;
  - vii. September 9, 2022.
- e. The purchase made by Mr. Duhaime on September 9, 2022, consisted of a Centon DataStick Pro2 USB 2.0 drive, with a storage capacity of 32 gigabytes. According to records maintained by Northeastern University, this was the only time Mr. Duhaime purchased a thumb drive at the Northeastern University bookstore using his university-issued American Express card.
- f. As of October 2022, Mr. Duhaime had accumulated 206 hours of paid vacation. Leave requests made by Mr. Duhaime were subject to review and approval by his supervisor.

JASON DUHAIME,  
Defendant

/s/ Scott Lauer  
SCOTT LAUER  
Counsel for Jason Duhaime

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/s/ Jason A. Casey  
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